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6 **UNITED STATES DISTRICT COURT**  
7 **CENTRAL DISTRICT OF CALIFORNIA**

8 A.H., et al.,

9 Plaintiffs,

10 v.  
11

12 COUNTY OF SAN BERNARDINO  
13 and JUSTIN LOPEZ,

14 Defendants.  
15

Case No.: 5:23-cv-01028-JGB-SHK

*Assigned to:*

Hon. District Judge Jesus G. Bernal

Hon. Mag. Judge Shashi H. Kewalramani

**DECLARATION OF RENEE V.  
MASONGSONG IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Date: September 23, 2024

Time: 9:00 a.m.

Crtrm: Courtroom 1

3470 Twelfth St.

Riverside, CA 92501

*[Filed concurrently with Plaintiffs' Exhibits; Plaintiffs' Memorandum of Points and Authorities; Response to Defendants' Statement of Genuine Disputes of Material Fact and Declaration of Roger A. Clark]*

**DECLARATION OF RENEE V. MASONGSONG**

I, Renee V. Masongsong, hereby declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and the United States District Court for the Central District of California. I am one of the attorneys of record for Plaintiffs A.H., H.H., C.H., and Patricia Holland. I make this declaration in support of the Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. Attached hereto as **Exhibit "1"** is a true and correct copy of the relevant portions of the Deposition of Justin Lopez, as taken on April 11, 2024.

3. Attached hereto as **Exhibit "2"** is a true and correct copy of the relevant portions of the Deposition of Kristopher Hillebrand, as taken on June 25, 2024.

4. Attached hereto as **Exhibit "3"** is a true and correct copy of the relevant portions of the Deposition of Mark Rios, as taken on June 25, 2024.

5. Attached hereto as **Exhibit "4"** is a true and correct copy of the relevant portions of the Deposition of Phillip L. Sanchez, as taken on August 21, 2024.

6. Attached hereto as **Exhibit "5"** is a true and correct copy of relevant portions of the transcript of Justin Lopez's belt recording, which Defendants have also filed as their "Exhibit F" in support of their Motion for Summary judgment.

I declare under penalty of perjury under that the foregoing that the foregoing is true and correct. Executed on August 30, 2024.

*s/ Renee V. Masongsong*

Renee V. Masongsong